

November 21, 2019

Comprehensive Plan Advisory Committee,
City of Milwaukie Officials and Staff,
and Others Whom This May Concern:

First, we would like to thank you for the thoughtful work you are all undertaking in this Comprehensive Plan process- thank you for your time and care!

Secondly, I would like to briefly explain why this feedback on the Draft Goals and Policies is being submitted. My name is Mikaila Smith, and I am an Outreach Specialist with Providence Better Outcomes thru Bridges Program, and a Co-Chair of the MACG Clackamas Housing Team. Specifically, my colleague Alex Gillow-Wiles and I work on a team dedicated to Providence's Clackamas Housing Project, in direct partnership with Metropolitan Alliance for Common Good (MACG). As there are currently zero year-round emergency shelters for people experiencing homelessness in Clackamas County (including approximately 55 individuals in Milwaukie, per the 2019 PIT count), we are tasked with seeking community partners interested in developing safe overnight shelter models. Particularly, we are hoping to assist interested churches, businesses and land-owners in developing scattered-site shelter models where shelter spaces in the form of safe parking, conestoga huts or sleeping pod structures can be provided in twos and threes throughout Clackamas County. Backed by grant funding from the Clackamas Housing Authority and Providence Innovation Funding, we (Better Outcomes thru Bridges and MACG Clackamas Housing Team) are dedicated to supporting the creation of such shelter programs and providing wrap-around case management services to shelter guests to assist their journey from homelessness to housing.

As we continue to seek community partners and pathways to initiate safe overnight shelter models in Clackamas County, we certainly have a great deal of interest in the City of Milwaukie's Comprehensive Plan and how these policies can be leveraged to better serve our unhoused neighbors in Milwaukie.

We have reviewed the drafted goals and policies (document dated 10/23/19), and would like to provide feedback about some gaps we have identified in the current plan.

Recommendation 1:

Policy 7.1.3 states "promote zoning and code requirements that remove or prevent potential barriers to home ownership." Policy 7.1.7. states: "Collaborate with community partners to provide a continuum of programs that address the needs of unhoused persons and families, including temporary shelters, long-term housing and supportive services."

While we certainly agree with and support both of those policies, what seems missing is a policy stating a commitment to promote zoning and code requirements that remove or prevent potential barriers to *temporary shelter/safe overnight shelter development*.

Our experience has shown that while municipalities may agree to the idea of allowing or supporting temporary shelter in their communities, there are often numerous zoning and coding barriers that make implementing any such programs in the community a practical impossibility. We request that City of Milwaukie set, as a policy, a degree of flexibility and reduction of barriers for shelter implementation in regards to zoning and coding for shelter models.

While a policy attending to code provisions for shelter is addressed under Goal 7.2: Affordability, we believe that the issues of coding and zoning barriers to shelter is at heart, an Equity issue, and pertinent to Goal 7.1.

Recommendation 2:

Under Goal 7.2- Affordability, there is language addressing ADUs, tiny homes, manufactured homes, shelters and transitional housing. We recommend that language be added to support alternative shelter models such as conestoga hut shelters and/or sleeping pod structures (8' X 12' insulated wooden structures).

In the past, zoning and coding has been a barrier to exploring if these structures could be used as a shelter model in City of Milwaukie. These structures are low-impact (no foundation, excavation, or permanent structures necessary), low cost and can be implemented in pre-existing spaces such as faith community parking lots and properties. If allowances for these structure types were added to building code, community partners would have a pathway to leverage their resources to create shelter programs at a fraction of the cost it would take to develop a traditional brick-and-mortar shelters.

Thank you again for your investment in this process! And thank you for your consideration.

In community,

Submitted by

Mikaila Smith, CSWA
Outreach Specialist, Providence BOB Program
and Co-Chair, Clackamas Housing Team

on behalf of

Clackamas Housing Team
Metropolitan Alliance for Common Good (MACG)

and

Providence Better Outcomes thru Bridges (BOB)

**Draft Comprehensive Plan Goals and Policies for Fostering Community and Culture,
Section 1: Community Engagement Preamble as follows:**

To fully realize the contributions of all residents, and promote diversity and inclusion of all points of view, it is incumbent upon the City of Milwaukie to invest in resources and software necessary for modern community engagement, create effective online engagement methods, and create an accessible, transparent, and easily searchable online portal of public documents and data.

As the Milwaukie Community Vision strongly encourages engagement and participation by all and nurtures a deep sense of community through celebrations and collective action, and as the City of Milwaukie recognizes the contributions of all residents are among our most valuable assets, the City of Milwaukie shall recognize and act upon its stated goal of increasing community engagement by adopting a modern digital engagement portal.

The online portal of easily searchable documents and data will promote the exchange of ideas, increase collaboration, and lead to the reconciliation of differences around the use of public spaces and public funds. Furthermore, the City shall establish a feedback mechanism to allow for continuous improvement to highlight public comment and incorporate public feedback into the design and continuous improvement of its online document and data portal.

In addition, the City shall effectively administer and manage the distribution of email newsletters and social media allowing for all residents to participate in the public process, regardless of their NDA participation, or the capacity of their NDA to publish and disseminate vitally important information deemed necessary for fostering and sustaining community engagement.

The implementation of this modern community engagement model shall be based on :

1. Easy access to register for the City of Milwaukie email newsletter via the city website, in the Pilot, and at any City of Milwaukie meeting or public event.
2. Improved navigation of the City website to include portals specific to land use and transportation projects with compilations from City meetings, packets, and resolutions.
3. Proper management of citizen email subscriptions to allow for subscription to emails on culture, land use and transportation, climate change, and housing etc.
4. Publishing a weekly digest of all meetings, announcements, and decisions specific to land use and transportation, all projects in all neighborhoods across the entire City.
5. Publish a glossary of terms and definitions that is easily accessible and allows community members to decipher policy language and planning jargon into easy to understand terms.

6. Define effectiveness standards and metrics for improving public outreach to new community members, encouraging diverse points of view, and establishing a Board, Committee, or Commission to enact broad and effective outreach efforts via established criteria and evaluation through measurement of all community engagement efforts.
7. Author and publish a Community Engagement Policy and Implementation Plan and Evaluation Standards to set goals and measure benchmarks required to exceed community involvement goals.

Section 1: Community Engagement

Goal 1.1 - Foster broad, **Effective**, and Collaborative Community Participation: Implement and encourage practices that increase community participation by providing **complete information**, consulting with the community, and fostering collaborative partnerships **with community leaders**.

Policy 1.1.1: Generate interest and encourage diverse participation in City **boards**, committees and commissions through broad **effective** outreach.

Policy 1.1.2: Ensure publications and printed materials regarding current issues and proposed policies are readily accessible, **as defined in the preamble**, for all ages and abilities, allowing for **equitable engagement** and **informed** dialogue between policy-makers and the community.

Policy 1.1.3: Keep the community informed of opportunities for involvement **through common and preferred surveyed modes of communication including:**

U.S. Postal Service, email newsletters, city website, social media (all regular city meetings listed as events on social media with effective informative lay-person friendly content and invitations sent), print and radio, flyers, mail back & online surveys, presenting information at fairs and events, and direct outreach to existing organizations and community leaders.

Policy 1.1.4: Enhance and extend community involvement by using emerging technologies, methods and techniques, **including the online portal, proper classification of documents, and effective email newsletter and notification management as described in the preamble.**

Policy 1.1.5: **Continuously** improve engagement and dialogue with property owners, tenants, and employees in Milwaukie's commercial and employment areas **through the most effective and preferred surveyed modes of communication and emerging technologies, methods and techniques.**

Goal 1.2 - Promote Inclusion and Diversity: Involve a diverse cross-section of the community in community events and decision making related to land use and comprehensive planning, including people from a variety of geographic areas, interest areas, income, races, ethnicities, genders, sexual orientations, and all ages and abilities.

Policy 1.2.1: Build engagement across Milwaukie's diverse communities by notifying and facilitating participation in all land use and Comprehensive Plan related activities **using proven effective methods of outreach as defined in policy 1.1.3. and policy 1.1.4.**

Policy 1.2.2: Provide information to the community in multiple languages where appropriate.

Policy 1.2.3: Seek public input on major land use issues through community organizations, such as faith groups, business associations, school districts, non-profits, service organizations, **Neighborhood District Associations and established non-NDA citizen organizations**, and other bodies to encourage broad, **effective, and informed** participation.

Policy 1.2.4: Reduce barriers to participation by considering language, meeting time, location, and required level of involvement, **and effective two-way dialogue between citizens and the city.**

Goal 1.3 - Maintain Transparency and Accountability: Ensure transparency and accountability in City and land use policy decision-making by maintaining access to City leadership, **timely and respectful response to citizen inquiries**, and making a commitment to **equitable engagement practices**

Policy 1.3.1: ~~Recognize the Planning Commission as the City's Community Involvement Advisory Committee (CIAC) to evaluate community involvement practices related to land use and comprehensive planning. The CIAC shall meet annually to specifically review community involvement practices.~~ **Per OAR 660-015-0000(1), establish and recognize a Commission for Citizen Involvement (CCI) to formulate and execute community involvement practices related to surveyed community values and communications with citizens on land use and comprehensive planning. The Citizen Involvement Program (CIP) shall be appropriate to the scale of the planning effort. The CCI shall include members from ALL neighborhoods and commercial districts of the city with seats for 2 representatives from each district (1 of which is reserved with first-right-of-refusal for an NDA member from each district). The CCI's community involvement practices and effectiveness will be evaluated annually by the City Council.**

Policy 1.3.1a: **The city shall establish/assign a staff member who works with the CCI to regularly provide a representative voice for the citizens and various communities' concerns on all city matters at all meetings and in all city publications (online, print, and audio), including (but not limited to) City Council Regular Meetings and Planning Meetings and any other commissions or committees whose decisions impact the city, its neighborhoods, communities, and citizens. All councils, committees, and commissions are required**

to take the CCI and staff member counterpart's recommendations into account in making decisions for the overall good of the city, its citizens, neighborhoods, and various communities.

Policy 1.3.2: Establish a Comprehensive Plan Advisory Committee (CPAC) to assist in periodic review or major updates of the Plan **that includes citizen representatives from ALL neighborhoods and commercial districts of the city and representation of a variety of interests from each district.**

Policy 1.3.3: **The CCI and City Staff Representative shall track and evaluate the success of community involvement activities based on established effectiveness goals and metrics and make results available to the community through a monthly (or quarterly) written report on achievements posted on the city's website, social media, and printed in the Milwaukie Pilot. Quarterly evaluations will be done and adjustments made to increase effectiveness of community involvement over time.**

Policy 1.3.4: Prioritize funding in the planning budget to support inclusive **effective** community engagement and participation.

Goal 1.4 - Uphold Neighborhood District Associations (NDA) and non-NDA community organizations: Continue to support, inform **in a timely manner**, consult, and empower community members through the Milwaukie Neighborhood District Associations (NDAs) and **other easily identifiable non-NDA community organizations.**

Policy 1.4.1: Encourage and support NDA **and non-NDA community** leadership to develop and implement strategies to nurture new leaders and increase participation while intentionally reflecting the diversity in each neighborhood.

Policy 1.4.2: Provide opportunities for NDAs **and non-NDA community groups** to give relevant and effective testimony to the City Council and Planning Commission on matters affecting their neighborhoods.

Policy 1.4.3: Assist NDAs by providing financial assistance, subject to budgetary allocations as approved by the City Council.

Policy 1.4.4: Notify NDAs **and non-NDA community groups in a timely manner on all relevant land use and comprehensive planning matters** and solicit feedback on proposed land use actions and legislative changes as required by ordinances.



**NORTH
CLACKAMAS
WATERSHEDS
COUNCIL**

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northclackamaswatersheds.org

12/9/2019

To: Denny Egner, Planning Director, City of Milwaukie
David Levitan, Senior Planner
From: Neil Schulman, Executive Director
cc: Mark Gamba, Mayor
Lisa Batey, City Councilor
Natalie Rogers, Climate Action Plan Manager

RE: Comments on Comprehensive Plan Proposed "Pinned Down Policies"

The North Clackamas Watersheds Council thanks the City of Milwaukie for a well-thought out Comprehensive Plan process and appreciates the opportunity to provide input on the sections and policies relevant to our mission of ensuring healthy watersheds for fish, wildlife, and people. We look forward to partnering more in the future with the City of Milwaukie in the creation of the final version of these policies, and the adoption of the subsequent maps, zoning, ordinances and codes. Below are our comments. We are always happy to discuss them with you further.

Our comments address areas relevant to our mission of restoring healthy watersheds for fish, wildlife and people. As a result we have largely focused our comments on Blocks 2 and 3.

General Comments:

We believe that the City's policies go a long ways to creating a future in which Milwaukie will have a largely healthy environment as it grows. However, we also believe that certain areas should be strengthened given the reality of a changing climate and the forecasted population growth. We believe these policies and goals should be more robust and should more fully incorporate the climate work that the City is doing that places it in a leading position among small cities.

Block 2 “Pinned Down” Goals and Policies:

Parks and Recreation Policies

Overarching Chapter Goal:

- We support this goal and the inclusion of natural areas along with recreational uses. We agree that future expansion should serve underserved areas. However, we believe two critical aspects of the overarching goal are missing:
 1. Change “maintain existing natural areas for conservation” to “maintain, expand, and establish/acquire new natural areas for conservation.” As the population of Milwaukie grows, existing natural areas will not be sufficient to either maintain ecological integrity in the face of increased development, and/or to provide sufficient access to nature (known to be vital for human health) for a growing population.
 2. In addition to serving underserved areas, future expansion should also focus on preserving ecological integrity: habitat connections for fish and wildlife, including anchor parcels and migration corridors between them, preservation of rare habitat types (such as oak woodland) and habitats for keystone, rare, and ESA-listed species (such as salmon and steelhead). This criteria has guided regional natural areas planning since the adoption of the Greenspaces Master Plan by Metro in 1992 and should be reflected in this plan as well. This is implied in Policy 4.2.4, but should be articulated in the Chapter Goal explicitly.

Goal 4.1: Partnerships and Funding

We support the policies as written.

Goal 4.2: Planning and Design:

- *Section 4.2.7: Enhance use of Open Space at Kellogg Water Treatment Plan Site:* Given that this site is adjacent to Kellogg Dam, Milwaukie Bay, and the planned trail undercrossing, and that future priorities the City and the Council include the removal of Kellogg Dam and/or fish passage into Kellogg Creek, any plans for this site must be compatible with dam removal and/or restoration of Kellogg Creek to its free-flowing state.
- We support other policies in this section as written.

Goal 4.3: Transportation and Connectivity

- *Section 4.3.1 to 4.3.4.:* We strongly support this policy as articulated. Active transportation networks have valuable ability to combine transportation, human health, and natural area goals, and economic development. Rather than thinking of “nature” and “developed landscapes” as separate, these policies reflect that they can and should be integrated into the community fabric.

Goal 4.4: Park Development and Maintenance

- We support the policies as written. We particularly support and urge strong implementation of 4.4.6 and 4.4.7, as they provide mechanisms for increasing greenspace and public space where there are deficiencies and natural area connections, and providing valuable incentives to developers.

Willamette Greenway Policies:

Overarching Chapter Goal: We support the articulated goal. We also feel that access to the Willamette River for Milwaukie residents should be maintained and enhanced beyond the access provided at Milwaukie Bay, and that the goal statement should reflect this.

Goals 15.1-15.3 and Related Policies:

We support these goals and policies as written.

Goal 15.4: Natural Resource Protection

- *Policy 15.4.1:* We strongly support the conservation values and protection of these overlay zones. It is vital that the City both continue them as they relate to the Willamette River and resist attempts to weaken and/or provide variances.
- *Policy 15.4.2:* We strongly support an increase in tree canopy in the Willamette Greenway. We believe that merely mitigating for trees lost through development will be inadequate at providing the many value of trees to people, fish and wildlife, and property values, as Milwaukie's population grows. Given the essential roles trees play in reducing the climate-induced heat island effect, cooling stream temperatures, and providing carbon sequestration, merely replacing lost trees will not be adequate. We must ensure a net increase in tree cover, both within the Greenway, in the City as a whole, and on a neighborhood basis. It is anticipated that climate change (in addition to development) will cause increases in tree mortality independent of development as many species will be heat/drought stressed. City policy should call for a net increase and a species and age in Greenway's tree cover.
- *Policy 15.4.3:* The Council strongly supports the removal of Kellogg Dam, as we are working in partnership with the City to advance this project. We support the removal not requiring greenway review, and we support the articulation of the restoration of Kellogg Creek. The language should allow flexibility in strategies for stream restoration at the Kellogg Dam/Kellogg Lake site:
 1. "Removal of Kellogg Dam" should be worded to read "removal and/or other steps to support a free-flowing Kellogg Creek." The current stakeholder engagement process has already surfaced potential ideas that may include allowing Kellogg Creek to flow into the Willamette through an alternate channel and/or other designs that may achieve the same objectives without

the cost of removing the existing structure. Language here should not foreclose these options prematurely.

2. "Restoration of Kellogg Creek through revegetation of riparian areas with native species" should be reworded to read "Restoration of Kellogg Creek through revegetation of riparian areas with native species, increases channel complexity, pools, floodplain reconnection, large wood placement, and/or other restoration techniques" to reflect the full suite of possible restoration actions, of which native revegetation is only one.
- *Policies 15.4.4. and 15.4.5:* We support these policies as written.

Goals 15.5 (Recreation) and 15.6 (Public Access and View Protection):

- We support these goals and policies as written.
- We especially support the language of Policy 15.6.4, noting that enhancing riparian vegetation along Kellogg Creek to improve aquatic habitat conditions for native species will be a higher priority than maintaining or improving views. The current impaired water quality and high temperature of Kellogg Creek requires additional shade as well as other restoration, so this policy is essential to returning Kellogg Creek to an unimpaired status.

Goal 15.7, Downtown:

- We support the Goal and Policies are largely as written.
- *Policy 15.7.1:* Providing safe pedestrian access between downtown Milwaukie and the Willamette River has thus far been focused on an alternative crossing of McLoughlin, which, if Kellogg Dam were to be removed and/or modified, could be located next to a restored Kellogg Creek at the dam site. We support this option should it prove feasible in efforts to address Kellogg Dam. Given the complexity of this project, and the possibilities that restoration may not require full removal of the dam in order to restore a free-flowing creek, the City should acknowledge that subsequent processes addressing the dam may require some modifications to existing plans for this pedestrian connections.

Natural Hazards Policies

- We agree with the Overarching Chapter Goal, and we applaud the City for its work to forecast and avoid future impacts of climate change.
- *Goal 7.1: Identifying and Reducing Hazard Potential:* Wording should read "avoid potential negative impacts, and reduce when avoidance is not possible."
- *Policy 7.1.1:* We strongly support the essential role that natural hazards maps play in locating hazards and reducing risks to people, property, and natural systems. Floodplain, FEMA and many other maps are often out of date and fail to account for the changes already being experienced due to climate effects on precipitation regime and increases in impervious surface.

- *Policy 7.1.1 through 7.1.4:* Climate change effects are accelerating faster than even recently forecast. We therefore urge the City to use and/or require a conservative standard that acknowledges the new nature of this science, and when the evidence is uncertain, to err on the side of reducing development in areas that may be prone to floods, landslides, unstable slopes and soils, drought, and sea/river level rise. This protects people, property, ecosystems, and public investment.

Goal 7.2.: Partnerships and Education

- We support the Goal and Policies are largely as written. Our comment above also applies to Policy 7.2.3 and 7.2.4.

Goal 7.2.: Infrastructure and Building Resiliency

- We support the Goal and Policies are largely as written to the extent they apply to watershed health.
- Our comment above also applies to Policy 7.3.3. and 7.3.4

Goal 7.4: Adaption and Mitigation:

We strongly support the City's response to this critical topic. We urge the City to develop strong codes and ordinances to implement these policies. In addition to our comments on the following policies, we propose an additional policy to address the development of green infrastructure.

- *Policy 7.4.1:* As has already been seen on both FEMA buyouts on Mt. Scott Creek and work by the City of Portland along Johnson Creek, active steps must be taken to restore historic floodplain function. This often includes acquiring properties to create an area that can absorb floodwaters and therefore reduce flood risk to people property downstream. On Johnson Creek this has also provided water quality, habitat, and outdoor recreation benefits. This is often the only alternative to repeated risk to people and property, at public expense, from continuing to rebuild in the floodplain. Given Milwaukie's location in the lower reach of the Kellogg and Mt. Scott watershed, this is a critical policy and program.
- *Policy 7.4.4:* We strongly support the future requirement (rather than simply encouraging) green infrastructure and development practices. This will be essential in modernizing our built environment. We commend the City for taking this step.
- *Proposed New Policy:* Create a mechanism that ensures proposed development receive cutting-edge consultation on green infrastructure and development processes early in the development process. Under current practice, proposed development has typically already underdone a significant portion of design before the Council and/or other organizations with interest and expertise in green infrastructure are notified. This is a significant barrier to instituting green

infrastructure since it require re-design work at considerable cost and time. We urge the City to provide notification at the earliest possible pre-design and conference stages, to provide experts and/or expertise regarding cutting edge approaches to developers early, and/or to require these consultations before a preliminary design is created, rather than after the fact.

Climate Change and Energy Policies

Overarching Chapter Goal:

- As started earlier, we applaud the City for taking steps to anticipate and respond to likely climate impacts, and for leading north Clackamas County in this regard.
- As noted on Page 3, many climate-related changes are accelerating faster than anticipated. The City's policies and implementation should therefore create a margin of error of protection.

Goal 13.1: Built Environment

We strongly support the goal statement.

- *Policy 13.1.1:* Should be modified to reiterate earlier language on green infrastructure, to read "Encourage, and eventually require, the use of innovative design and building materials that increase energy efficiency..."
- *Policy 13.1.2 and Policy 13.1.3:* We support the statements as written.
- *Policy 13.1.4:* We strongly support this statement, and believe this is a critical step to yield multiple benefits, including preserving human health from poor air quality and excessive heat, reducing the urban heat island effect, and to maximize the beneficial effects of tree canopy on property values, community livability, enjoyment, and health. Specifically, tree standards and ordinances must address preservation of large trees on private property as well as in public areas; there is simply not enough public land to reach a 40% canopy goal without preserving trees on private property. These trees deliver public benefits, and their removal imposes public costs of reduced air and water quality benefits, lower neighbors' property values, etc. Furthermore, large trees cannot be replaced by planted trees in any time frame less than multiple generations. While there should be exceptions for hazards and for watershed restoration activities (such as thinning to allow rare Oak habitat to grow) the retention of existing large trees on both public and private land is critical.
- *Policies 13.1.5-13.19:* We support the policies as written.

Goal 13.2: Transportation and Utility Infrastructure:

We support the Goal and Policies as written.

Goal 13.3: Adaptation and Mitigation:

We support the Goal and Policies; however we believe the issue of late-season water availability is entirely unaddressed:

- *Proposed New Policy:* Ensure late season instream water availability using a variety of methods including but not limited to stormwater detention, standards for both discharge amount and duration of discharge in stormwater standards, acquisition, lease, and /or transfer of location and purpose of water rights, increased standards for infiltration, reduced impervious surface, and/or other techniques.

Block 3 “Pinned Down” Goals and Policies:

Natural Resource & Environmental Quality Policies:

- Overarching Chapter Goal: We support the goal largely as written; however it should include water quantity, as well as water quality, in the goal statement.

Goal 1: We support the Goal and 4 subpoints as written.

Goal 2: Enhance Water Quality and Water Resources:

- *Amend Goal statement to read “Enhance Water Quality, Ensure Water Quantity and Flow Regimes that Sustain Healthy Streams and Water Resources”.* Healthy water resource management must include not only water quality (the absence of pollution or excessive heat) but also the availability of water in a natural flow pattern that avoids hydromodification, reduces flood risk, allows for groundwater recharge, etc.
- *Subpoint 1:* We support as written. The acknowledgement of the importance of uplands in water resources is critical and we applaud the City for this recognition.
- *Subpoint 2:* We strongly support this goal. As stated earlier, options in current preliminary consideration may not require the removal of the existing structure to restore a free-flowing Kellogg Creek. We therefore suggest “restore a free-flowing Kellogg Creek at the Kellogg Dam site.”
- *Subpoint 3:* We strongly support his goal, given the City’s location at the downstream portion of Kellogg Creek, and we hope the Council can continue to facilitate these efforts.
- *Subpoints 4-5:* We support these as written.
- *Subpoint 6:* Modify to read “When considering development proposals, take into account changes in water flow, quantity, and *duration of flow associated with both development and climate change*, and evaluate the downstream impacts of development in upland areas. This reflects current cutting-edge standards and those currently under consideration by WES to address the duration of discharge from development as well as sheer quantity.

- *Subpoint 7:* As per the above, add duration in addition to amount, temperature, turbidity and quality.
- *Subpoints 8-10:* We support these as written.

Goal 3: Protect and conserve fish and wildlife habitat:

We support this goal and the subpoints as written. We also feel that one additional subpoint is needed:

- *Subpoint 8 (new):* Fill existing gaps in knowledge of the population, trends, and connectivity of habitat fish and wildlife populations. Many critical species lack either baseline population status to measure trends, and/or to identify key habitat or target restoration activities.

Goal 4: Develop a healthy urban forest in Milwaukie:

- *Overall:* We strongly support this goal. As stated earlier, this is a critical goal that cannot be met on public land alone. We therefore strongly support Subpoints 1-4, and encourage the City to enact steps that protect large trees on private land as well as public land.
- *Subpoint 5:* We strongly support the focus on native and climate-adapted species. We also encourage the inclusion of explicit language for a multi-aged canopy that will be sustainable over time.
- *Subpoint 6:* We strongly support the assessment of the stormwater impact of tree removal, as existing trees are often the most effective and least expensive means of reducing stormwater impacts. Because trees slow the flashiness and erosion and resulting hydromodification of streams, this should read "Evaluate the stormwater and water quantity impacts."

Goal 5: Sustainable Design and Development

We strongly support the Goal and subpoints. Comments about notification and engagement in design alternatives early in the process from Block 2, Section 7.4.4 apply here as well.

Goal 6: Air Quality

We support the policies and subpoints as written.

Public Facilities and Services Policies:

- We support the portions of Goals 1-9 that relevant to watershed health and climate as written.
- *Goal 4, Subpoint 1:* We strongly support this acknowledgement of the importance of overall watershed function, floodplain restoration, and the connection between the uplands and flood risk, watershed function, water quality

and climate change is a critical recognition; this connection should inform all land-use, stormwater, and natural resources planning.

Thank you for incorporating these elements into the final policies. We applaud the City for incorporating climate, watershed function, and other elements of watershed health into the Comprehensive Plan. Please contact us if you have any questions about these comments or wish to discuss them further. We look forward to working with the City to make Milwaukie a thriving, healthy community that is at the forefront of incorporating nature into all aspects of nature into the city.

Sincerely,

A handwritten signature in blue ink that reads "Neil Schulman". The signature is written in a cursive style with a large initial "N" and a long horizontal stroke extending to the right.

Neil Schulman
Executive Director